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March 22, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington D.C. 20554

Re: WC Docket Nos. 10-90, 14-58 and 14-259

Dear Secretary Dortch:

Pursuant to the New York CAF Auction Order, New York State hereby submits a summary of the auction guidelines that will govern Phase III of its reverse broadband auction for the CAF-eligible territories.

The auction guidelines fully comply with the requirements of the Order as they provide no “absolute preference” for any technology or speed. The auction will be a simultaneous, technologically-neutral auction in which all technologies will be eligible to submit applications and compete against one another for funding. Bidders will submit applications in eligible CAF census blocks in one of three service tiers, which closely track the tiers adopted by the FCC for the CAF Phase II auction. Consistent with the FCC’s approach, New York’s auction will also provide incentives for higher speed and lower latency services. In the New York auction, these services will receive notional bidding credits to account for the benefits of higher speed, lower latency services while balancing these benefits against the State’s desire to ensure that all unserved areas receive broadband services.

Secretary Dortch
March 22, 2017
Page 2

New York believes that its auction guidelines will ensure the continued integrity of the New York Broadband Program and the delivery of better, faster, and cheaper broadband services through alignment with the federal CAF program.

Respectfully submitted,

/s/

John M. Beahn

Counsel to Empire State Development

Enclosure